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Application for Appearance *Pro Hac Vice* Pending  
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**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re

SILVER STATE BROADCASTING, LLC,

- ☐ Affects Silver State Broadcasting, LLC  
☐ Affects Golden State Broadcasting, LLC  
☐ Major Market Radio, LLC  
☒ Affects all Debtors

Case No. BK-21-14978-abl

Jointly Administered with:  
Case No. BK-S-21-14979-abl  
Case No. BK-S-21-14980-abl

Chapter 11

**DECLARATION OF W. LAWRENCE  
PATRICK IN SUPPORT OF  
EMERGENCY MOTION TO EXCUSE  
TURNOVER IN FAVOR OF RECEIVER  
AND TO DISMISS/ABSTAIN, OR,  
ALTERNATIVELY, FOR STAY RELIEF  
AND/OR CONVERSION**

Hearing Date: *Application for OST Pending*  
Hearing Time: *Application for OST Pending*  
Place: Courtroom 1, Third Floor  
Foley Federal Building  
300 Las Vegas Boulevard South  
Las Vegas, Nevada 89101

FOX ROTHSCHILD LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899  
(702) 597-5503 (fax)

1 I, W. Lawrence Patrick, declare under penalty of perjury as follows:

2 1. I am the court-appointed receiver (in such capacity, the “Receiver”) for certain of the  
3 assets of the above-captioned the debtors and debtors-in-possession (collectively, the “Debtors”),<sup>1</sup>  
4 pursuant to certain orders entered by the United States District Court for the Central District of  
5 California (the “District Court”) and the California Superior Court for the County of San Francisco  
6 (the “State Court”). I make this declaration in support of the concurrently-filed *Emergency Motion*  
7 *to Excuse Turnover in Favor of Receiver and to Dismiss/Abstain, or, Alternatively, for Stay Relief*  
8 *and/or Conversion* (the “Motion”)<sup>2</sup> and for all other purposes authorized by law.

9 2. Except as otherwise indicated herein, this Declaration is based upon my personal  
10 knowledge. I am over the age of 18 and am mentally competent. If called upon to testify, I would  
11 testify competently to the facts set forth in this Declaration.

12 **A. Professional Background and Qualifications**

13 3. I am Managing Partner of Patrick Communications, LLC (“Patrick  
14 Communications”), a media investment banking and brokerage firm that also provides management  
15 consulting services. I founded Patrick Communications in 1984 and the company is based in  
16 Columbia, Maryland. I am also the managing partner of Legend Communications, a 25-radio group  
17 owner, and serve as the Board Chair Emeritus of the National Association of Broadcasters Leadership  
18 Foundation and its affiliated Political Action Committee.

19 4. From 1982 through 1992, I owned 12 radio stations valued at more than \$75 million  
20 in seven markets. I also previously served as Chief Operating Officer of Gilmore Broadcasting of  
21 Kalamazoo, Michigan (“Gilmore”). During my time as COO, Gilmore owned four radio and three  
22 television stations, as well as 18 cable television stations.

23 5. From 1979 through 1983, I served as Senior Vice President of the National  
24 Association of Broadcasters (the “NAB”). I was also a professor of communications at both the  
25 \_\_\_\_\_

26 <sup>1</sup> The Debtors are Silver State Broadcasting, LLC (“Silver State”), Golden State Broadcasting, LLC  
27 (“Golden State”), and Major Market Radio, LLC (“Major Market”). Unless otherwise set forth herein,  
all “Docket” references are to the docket of the Silver State Bankruptcy Case.

28 <sup>2</sup> Unless otherwise defined herein, all capitalized terms herein have the definitions set forth in the  
Motion.

1 University of Tulsa and the University of Maryland for four years, full-time prior to joining NAB  
 2 and continued to teach at the University of Maryland for an additional 12 years as an adjunct  
 3 professor.

4 6. In addition to these cases, I have served as a federal court receiver or bankruptcy  
 5 trustee in six cases involving 16 broadcast stations. I have served as receiver or trustee at the request  
 6 of the United States District Courts and the United States Bankruptcy Courts for Districts in  
 7 California, Massachusetts, Texas, Ohio, Utah, and Connecticut. In those matters, I served as receiver  
 8 or trustee for television and radio stations located in, among other places: Fresno, California;  
 9 Modesto, California, Oxnard, California; Salt Lake City, Utah; Allentown, Pennsylvania; Savannah,  
 10 Georgia; Davenport-Rock Island, Illinois; Dayton, Ohio; McAllen, Texas; and Hartford, Connecticut.  
 11 In addition, I have served as a consultant on voluntary workouts of more than 50 other broadcast  
 12 stations. I have also represented Bank of America, National Westminster Bank, Fleet Bank, Fortress  
 13 Investments, Cerberus Investments, AMRESKO, RECOLL Management, and MLQ Investors in  
 14 distressed property situations.

15 7. I have testified in 26 federal and state court cases as an expert witness on station  
 16 valuations, contract damage claims, libel damages, and station management and operations. I have  
 17 also testified before Committees of both the United States Senate and United States House of  
 18 Representatives, the Federal Communications Commission (the “FCC”), the Federal Trade  
 19 Commission, the Copyright Royalty Tribunal, and the Australian Communications Department.

20 8. In 1972, I received a Bachelor of Arts in Telecommunications from the University of  
 21 Kentucky. In 1973, I received a Master of Science in Communications from the University of  
 22 Tennessee. In 1975, I received a Ph.D. in Communications from the Ohio University. In 1979, I  
 23 received a Juris Doctor from the Georgetown University Law Center.

24 9. Further detail concerning my professional experience and qualifications is provided  
 25 in my Curriculum Vitae, a true and correct copy of which is attached hereto as **Exhibit 1**.

26 **B. Appointment as Receiver**

27 10. On November 16, 2012, Bellaire Tower Homeowners Association (“Bellaire”) filed a  
 28 complaint (the “Bellaire Complaint”) against Golden State in the State Court, which initiated the case

captioned *Bellaire Tower Homeowners Association v. Golden State Broadcasting, LLC*, Case No. CGC-12-526191 (the “Ballaire Case”). On July 22, 2014, the State Court entered a judgment (the “Bellaire Judgment”) in favor of Bellaire and against Golden State in the amount of \$111,426.06 after application of a security deposit. I understand that the unpaid balance of the judgment is not less than \$340,039.85 and that interest, costs, and attorney’s fees continue to accrue, pursuant to the Bellaire Judgment. On October 22, 2020, the State Court entered an order appointing me as the Receiver of the defendants’ assets in the Bellaire Case

11. On April 1, 2016, WB Music Corporation and certain other plaintiffs (collectively, the “Plaintiffs”) filed a complaint (the “WB Complaint”) against Silver State, Golden State, Royce, Playa Del Sol Broadcasters (“Playa”), and Mr. Stolz in the District Court, which initiated the case captioned *WB Music Corp., et al. v. Royce International Broadcasting Corp., et al.*, Case No. 5:16-cv-00600-JGB-SP (the “WB Case”). On May 22, 2018, the District Court entered a judgment (the “WB Judgment”) in favor of the Plaintiffs and against each defendant (including Golden State and Silver State) in the amount of \$330,000 plus interest. The WB Judgment was amended three times during the course of the WB Case. On July 6, 2020, the District Court entered an order appointing me as the Receiver of the defendants’ assets<sup>3</sup> in the WB Case (the “Receivership Order”).

### C. The State of the Debtors’ Radio Stations

12. At the time of my appointment as Receiver, the Debtors’ principal, Mr. Stolz had essentially shut down the operations of the Radio Stations either months or a year earlier. By way of example, the Radio Stations did not employ the following types of personnel that are common for an operating radio station: local managers, sales executives, traffic personnel (personnel who schedule commercials and prepare billing for advertising clients), on-air announcers, production personnel, or engineers. As a result of these and other operational decisions, Mr. Stolz had stripped the Radio Stations of all costs commonly associated with an operating radio station. As such, the Debtors’ Licenses are the only material assets aside from some older broadcast equipment. The Radio Stations

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<sup>3</sup> Among other things, the Receivership Order appointed me as receiver of the Debtors’ three FM Radio Stations. For the avoidance of doubt, the Debtors’ AM Radio Station and three translators (e.g., low-power FM stations) are not assets of the Debtors’ receivership estate.

do not generate significant revenue to pay for the expenses of the Receivership estate or typical radio station operations.

**D. The Sale to VCY America, Inc.**

13. On August 17, 2020, I informed the District Court of a *bona fide*, all-cash offer to purchase the Radio Stations and requested that the Court review the offer *in camera*. As set forth in the offer, VCY America, Inc. ("VCY") proposed to acquire the Debtors' three FM Radio Stations for a cash purchase price of \$6 million. I recommended that the District Court approve the proposed sale to VCY because it was the highest and best offer I received for the Radio Stations after a thorough marketing process that followed an unsuccessful, year-long marketing effort by the Debtors. On November 9, 2020, following *in camera* review of the proposed transaction documents, the District Court entered an order authorizing the sale (the "Sale Order") to VCY.

14. The transfer of the Licenses to VCY is subject to review and approval by the FCC, which remains pending as of the date of this Declaration. In the interim, VCY has undertaken significant expense to bring the Radio Stations into working and permissible condition. By way of example, as of March 2021, VCY had expended approximately \$2,700 in travel costs related to due diligence; \$20,000 in contract engineering costs; \$45,000 in legal fees through December 31, 2020; \$80,000 to purchase equipment necessary to bring the Radio Stations into compliance with their Licenses; and an escrow payment of \$600,000 to purchase the Radio Stations. The FCC approval process remains in limbo as Mr. Stolz continues to assert non-meritorious bases for delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 23rd day of November, 2021.



W. LAWRENCE PATRICK

**Exhibit 1**



# **Curriculum Vita**

## **W. Lawrence Patrick**

### **Education**

- J.D.            Georgetown University Law Center, 1979
- Ph.D.           Ohio University, 1975  
Major:    Communications and Management  
Minor:    Urban Studies  
Dissertation: *Network Television News and Public Opinion Polls*
- M.S.            University of Tennessee, 1973  
Major:    Communications  
Minor:    Sociology
- B.A.            University of Kentucky, 1972  
Major:    Telecommunications  
Minor:    Sociology

### **Professional Experience**

Managing Partner, Patrick Communications (1983-present)  
Cody, Wyoming and Columbia, Maryland

A leading media brokerage, investment banking and management consulting firm with over \$ 8.5 billion in completed transactions, 40 major financial clients and over 850 broadcast and cable clients. Also served as expert witness in 36 federal and state court cases. Supervise a staff of nine professionals. Have managed over 100 radio and television stations as a Receiver or Trustee.

Managing Member, Legend Communications (1989-1992 and 1998-present)  
Cody, Wyoming

Former owner of seven radio stations and currently the owner of 25 small market radio stations in Wyoming. Overall staff of 75 persons currently.

Partner, NRJ, LLC (2010-present)  
Dallas, TX

Minority owner of 11 television stations in New York, Los Angeles, Boston, San Francisco, Philadelphia, Houston, Chicago and Honolulu.

Chairman of the Board, ION Media Networks (Board Member 2005 and Chairman 2005-2008), Palm Beach, Florida

Served as Chairman of the Board, Lead Independent Director and a member of the Audit and Compensation Committee at ION Media Networks, a national television broadcasting network serving over 91 million households daily with a core of 60 owned and operated television stations. ION is the largest holder of television spectrum in the United States. Mr. Patrick oversaw the refinancing of that company's \$1.1 billion in senior debt, an exchange offer with the \$1.7 billion tranche of public bondholders and eventually sold the company in a going-private transaction to Citadel Investment Group for \$2.6 billion.

President, Sterling Communications (1986-1989)

Owner of five radio stations in South Carolina, Louisiana and Mississippi. Staff of 75 persons.



Chief Operating Officer, Gilmore Broadcasting Corporation (1983-1986)  
Washington, D.C.

Corporate manager of three television and four radio stations plus 18 cable systems. Increased the value of the company from \$100.0 million to \$250.0 million in three years. Acquired and sold properties, held overall management responsibility and produced an increase in revenues and profits of over 300 percent in three years. Supervised a total staff of over 300 employees.

Consultant, Voice of America and Caribbean Broadcast Union (1983-2000)

Served as the primary consultant to the Voice of America and the Caribbean Broadcast Union. Consulted with the management of over 50 radio and television stations in over 30 countries. Taught broadcast management, sales and programming for seminars hosted by VOA both in Washington and overseas. Included multiple visits to the Bahamas, Barbados and the Czech Republic plus visits to Russia, Hungary, Poland and Ukraine. Put 30 radio and two TV stations on the air.

Senior Vice President, National Association of Broadcasters (1979-1983)  
Washington, D.C.

Executive at national broadcasting trade association. Responsible for policy research and testimony before Congress, federal agencies and courts. Spokesperson for the association and liaison with broadcast group owners. Interacted with broadcast groups and media regulators in the U.S., Australia, Canada, England and Mexico. Direct responsibility for 12 staff persons.

News Producer, WATE-AM/TV (1971-1973)  
Knoxville, Tennessee

Responsible for production of all news programming.

Producer and Director, University of Kentucky Television Center  
(1970-1971)  
Lexington, Kentucky

Responsible for the production of educational programs for the university.

News Producer, Director and Editor, WKYT-TV (1969-1970)  
Lexington, Kentucky

Produced the evening news as well as directed programs and commercials.

### **Academic Experience**

Adjunct Professor, Central Michigan University (2003-2018)  
Mount Pleasant, MI

Regularly guest lectured in the Broadcast and Cinematic Arts program on broadcast management and communications law.

Adjunct Professor, Georgetown University Law Center (2008)

Taught entertainment law focused on business aspects of the media. Included discussions of media financing, regulation, intellectual property, spectrum, media consolidation and policy perspectives.

Adjunct Professor, Department of Radio-Television  
University of Maryland (1985-1992)  
College Park, Maryland

Taught one course per semester. Included *Broadcast Management*, *Broadcast Law and Policy* and a *Seminar in New Technologies*.

Assistant Professor, College of Journalism,  
University of Maryland (1977-1985)  
College Park, Maryland

Headed the broadcast journalism sequence fulltime from 1977 to 1979 and then taught as an adjunct for one course per semester for six years. Included *Communications Law, Seminar on Urban Affairs Reporting, Broadcast News Reporting and Editing* and *Introduction to Media Writing*.

Assistant Professor, University of Tulsa (1975-1977)  
Tulsa, Oklahoma

Headed the broadcasting sequence and taught courses including *Communications Law, Broadcast News, Television Production, Film Production, Video Development and Mass Media and Society*.

Teaching Assistant, Ohio University (1973-1975)  
Athens, Ohio

Taught Television Production and Introduction to Audio classes.

Teaching Assistant, University of Tennessee (1972-1973)  
Knoxville, Tennessee

Taught Television Production class.

## **Professional and Academic Memberships**

Director, National Association of Broadcasters Radio Board (2019 to present)

Chairman, National Association of Broadcasters Leadership Foundation Committee (2015-2019).

Director, National Association of Broadcasting Educational Foundation (2010 to 2015)

Chairman, National Association of Broadcasters Political Action Committee (2008-2014)

Funds raised increased from \$450,000 annually to over \$1.1 million during my term.

Director, National Association of Broadcasters Political Action Committee (1999-present)

President, Broadcast Education Association (2002-2003)

BEA is the primary academic organization for broadcast communication professors with 1,500 members. It publishes three journals and holds an annual convention of 1,100 professors and professional broadcasters. During my term as President, BEA achieved a balanced budget and a cash surplus for the first time in five years.

Director, Broadcast Education Association (1999-2004) and (2017-present)

Member, Maryland Bar Association (inactive currently)

President, National Association of Media Brokers (2001- 2005)

NAMB is the primary association for media brokers and is involved in state regulation of the industry, diversity initiatives involving the

broadcast industry and the Federal Communications Commission and self-policing efforts involving business practices and ethics.

Chairman, Board of Visitors, College of Communication and Information,  
University of Tennessee, Knoxville, Tennessee (1999-2016)

Member, Development Council, University of Tennessee,  
Knoxville, Tennessee (2003-2007)

Chairman, Board of Advisors, College of Communications, Ohio University,  
Athens, Ohio (1995-2002)

Chairman, The John Bayliss Foundation  
(2009-2018)

Director, International Radio-TV Society  
New York, NY (2015-present)

Director and Treasurer, the Library of American Broadcasting Foundation  
New York, NY (2009-present)

Director, Hurricane Island Outward Bound  
(2014-2018)

Vice-Chairman and Director, Yellowstone Park Foundation  
Bozeman, MT (2009-2015)

Member, St. Jude Children's Research Hospital Capital Campaign Committee  
Memphis, TN (2020 to present)

## **Speeches and Presentations**

Testimony before the following federal regulatory bodies:

- Rules Committee, United States Senate
- Telecommunications Subcommittee of the Commerce Committee, U. S. House of Representatives
- Judiciary Committee, U.S. House of Representatives
- Federal Communications Commission (multiple appearances)
- Federal Trade Commission (multiple appearances)
- Copyright Royalty Tribunal (multiple appearances)
- Australian Communications Department

Speeches to the following organizations:

- California Broadcasters Association (3)
- Florida Association of Broadcasters (2)
- Georgia Association of Broadcasters
- Illinois Association of Broadcasters (4)
- Kentucky Association of Broadcasters (2)
- Maine Association of Broadcasters
- Michigan Association of Broadcasters (20)
- Mississippi Broadcasters Association
- Missouri Broadcasters Association (2)
- Nebraska Broadcasters Association
- North Carolina Association of Broadcasters
- Ohio Association of Broadcasters (7)
- Oklahoma Association of Broadcasters
- Tennessee Association of Broadcasters (6)
- Wisconsin Association of Broadcasters (2)
- Wyoming Association of Broadcasters (20)

- United States–Canada–Mexico Joint Association of Broadcasters Board meetings (4)
- Television and Radio Code Authority Board Meetings (6)
- Board and Managers Meeting, Nationwide Communications York Harbor, Maine
- Strategic Planning Conference, Jefferson-Pilot Broadcasting Charlotte, North Carolina
- Board and Managers Meeting, Bahakel Communications Charlotte, North Carolina
- Goldman Sachs Radio Investing Conference, New York City (3)
- Investing in Radio and Investing in Television Seminars, Kagan Seminars (18 appearances), New York City and other cities
- NAB Radio Shows and NAB Conventions (14 appearances)
- Board of Directors Meeting, AT&T Corporation, New York City
- Greenwood Development Management Conferences (8 appearances), Dallas, Texas
- Community Newspaper Association Convention Salt Lake City
- Business Council of Baltimore Baltimore, Maryland
- Venture Capital Association of Silicon Valley Dallas, Texas
- Scholarship Awards Banquet, Department of Broadcast and Cinematic Arts, Central Michigan University Mount Pleasant, Michigan



## **Publications**

*"Decision Making by Group Broadcasters"* by W. Lawrence Patrick and Herbert H. Howard, *Journal of Broadcasting*, Vol. 18, No. 4, (Washington, D.C.: Broadcast Education Association, Fall, 1974)

*"Going Back to Class"* by W. Lawrence Patrick, *Feedback*, Vol. 42, No. 3, (Washington, D.C.: Broadcast Education Association, Summer, 2001)

*"Assessing Radio Station Value: A Review of Academic Literature and Analysis of Contemporary Industry Models"* By Alan Albarran and W. Lawrence Patrick. (*Journal of Radio Studies*, 2005)

*Making Money with Subcarriers* by W. Lawrence Patrick and Susan K. Byers (Rockville, Maryland: Phillips Publishing, 1984)

*A Broadcasters Guide to S.B.A. Financing* by W. Lawrence Patrick and Susan K. Byers (Ellicott City, Maryland: Patrick Communications, 1994)

## **Honors and Awards**

Giant of Broadcasting and the Electronic Arts, awarded by the Library of American Broadcasting Foundation, New York City, November 2019

Ward Quall Award presented by the Broadcasters Foundation of America, Las Vegas, NV, April, 2017

Distinguished Alumnus Award, University of Tennessee, 2012

Outstanding Alumnus Award, Ohio University, Athens, Ohio, 1995

Outstanding Alumnus Award, University of Tennessee, College of Communications and Information, Knoxville, Tennessee, 1996

Outstanding Achievement Award for a Non-Alumnus, Central Michigan University. Mount Pleasant, Michigan, 2004

### **Expert Witness Testimony**

*Emmis Radio LLC v. Kurt Alexander a/k/a Big Boy*, Superior Court of the State of California, County of Los Angeles. Prepared an expert witness report for Defendant, (2015)

*Silver State v. Beasley Broadcasting*, District Court of Clark County, NV. Testifying for the Defendant. (2013)

*Harold Sudbury, Jr. v. V. Rosalind Sudbury*, Mississippi County-Chickasawba District, AR. Testified for the Defendant. (2013)

*Cumulus Broadcasting LLC v. Star Broadcasting, Inc.; and Qantum Communications Corporation v. Cumulus Broadcasting LLC*, Circuit Court, Pensacola, FL. Deposed for Cumulus Broadcasting. (2010)

*H. Richard Dallas, dMarc Shareholder Representative v. Google, Inc.* California, Judicial Arbitration and Mediation Services. Deposed for the Defendant. (2009)

*54 Broadcasting, et.al. v. LIN Television*, US Federal Court in Austin, TX. Deposed and testified for the Defendant. (2008)

*Estate of Douglas Manship, et. al. v. United States*, U. S. District Court, Baton Rouge, Louisiana. Retained by the US Department of Justice. Deposed for the Defendant. (2007)

*Sarkes Tarzian v. Gray Communications*, Federal Court, Atlanta, Georgia. Deposed for the Plaintiff. (2006)

*Plaster v. Gaylord Entertainment, et. al.*, Tennessee State Court. Deposed for the Defendant. (2006)

*Slabe and Carreira v. Midwest Television, et. al.*, Illinois State Court. Deposed and testified for the Defendant. (2004)

*New Wavo Communications Group, Inc. v. Cumulus Broadcasting, Inc. and Cumulus Licensing Corporation*, Texas State Court. Deposed for the Defendant. (2003)

*Azteca American Stations Group, LLC et. al. v. Citicorp Venture Capital, Ltd, et. al.*, California State Court. Deposed and testified for the Defendant. (2003)

*Communications Capital Managers v. J. Gisclair, et. al.*, Louisiana arbitration proceeding. Deposed and testified for the Plaintiff. (2003)

*Ann A. Mergens et. al v. Gunster, Yaokley & Stewart, PA et. al.*, Florida State Court. Deposed for the Defendant. (2003)

*Kilpatrick et. al v. Wiley, Rein & Fielding et. al.*, Utah State Court. Deposed for the Defendant. (2002)

*Julio Rumbaut v. Spanish Broadcasting System, Inc.*, Florida State Court. Deposed and testified for the Plaintiff. (2002)

*Force Communications & Consultants, LLC v. Cox Broadcasting, Inc, et. al.*, Federal Court Arbitration, Atlanta, Georgia. Deposed and testified for the Defendant. (2001)

*Entercom Communications Corp. V. Royce International, et. al.*, California State Court. Deposed and testified for the Plaintiff. (2001)

*Laurence v. Entravision, et. al.*, New York arbitration proceeding. Deposed and testified for the Defendant. (2001)

*Friedheim, et. al. V. Pezold, et. al.*, Federal court, Nashville, Tennessee. Deposed and testified for the Plaintiff. (2001)

*Charles K. Whaley v. Children's Broadcasting Corporation*, California State Court. Deposed and testified for the Defendant. (2000)

*Topaz Broadcasting, Inc. v. Rasa Communications, et. al.*, California State Court. Deposed and testified for the Plaintiff. (1999)

*George Singleton v. Anthony J. Fant and Fant Broadcasting Company*, Alabama State Court. Deposed and testified for the Defendant. (1998)

*Primrose Development Corporation, et. al. v. Benchmark Acquisition Fund I, L. P.*, Virginia State Court. Deposed and testified for the Plaintiff. (1998)

*Rainbow Development Corporation v. State of California Insurance Commissioner*, Federal Court, Florida. Deposed for the Plaintiff. (1997)

*Paul T. Lucci v. Rust Partners, et. al.*, Federal Court, Norfolk, Virginia. Deposed and testified for the Plaintiff. (1995)